

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND  
COMMERCIAL WORKERS UNION'S AND  
EMPLOYERS' HEALTH AND WELFARE TRUST  
FUND, on behalf of itself and all others similarly  
situated,

Plaintiff

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

07-CV-6916 (JGK)

ECF Case

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern Districts of New York, I, Michael C. Hartmere, a member in good  
standing of the bar of this Court, hereby move the Court for an Order allowing the admission pro  
hac vice of:

Nell B. Strachan  
Venable LLP  
210 Allegheny Avenue  
Towson, MD 21204  
Telephone: (410) 494-6200  
Fax: (410) 821-0147  
Email: nbstrachan@venable.com

Nell B. Strachan is a member in good standing of the Bar of the State of Maryland.

There are no pending disciplinary proceedings against Nell B. Strachan in any State or Federal  
Court.

AUG 11 2008


925-659596  
JK

U.S. DISTRICT COURT  
S.D. N.Y.  
2008 AUG 11 PM 2:40

Dated: August 11, 2008  
New York, New York

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Michael C. Hartmere", written over a horizontal line.

Michael C. Hartmere (MH-6839)  
VENABLE LLP  
1270 Avenue of the Americas  
25th Floor  
New York, New York 10020  
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Fax: (212) 307-5598  
mchartmere@venable.com

*Attorneys for Defendants Abbott  
Laboratories and Abbott Laboratories, Inc.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND	:	
COMMERCIAL WORKERS UNION'S AND	:	07-CV-6916 (JGK)
EMPLOYERS' HEALTH AND WELFARE TRUST	:	
FUND, on behalf of itself and all others similarly	:	ECF Case
situated,	:	
	:	
	:	
Plaintiff	:	<b>DECLARATION OF MICHAEL C.</b>
	:	<b>HARTMERE IN SUPPORT OF</b>
v.	:	<b>MOTION TO ADMIT COUNSEL</b>
	:	<b><u>PRO HAC VICE</u></b>
PURDUE PHARMA L.P., <i>et al.</i> ,	:	
	:	
	:	
Defendants.	:	

State of New York                    )  
  )       ss:  
County of New York                )

MICHAEL C. HARTMERE hereby deposes and says as follows:


1. I am an associate in the firm Venable LLP, counsel for Defendants Abbott Laboratories and Abbott Laboratories, Inc. ("Abbott") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Abbott's motion to admit Nell B. Strachan as counsel pro hac vice to represent Abbott in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Nell B. Strachan since 2008.
4. Nell B. Strachan is a partner in Venable LLP, in Towson, Maryland. Her office is located at 210 Allegheny Avenue, Towson, Maryland 21204.

5. A certificate of good standing for Nell B. Strachan in the State of Maryland is attached hereto as **Exhibit A**.
6. I have found Nell B. Strachan to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of Nell B. Strachan, pro hac vice.
8. I respectfully submit a proposed order granting the admission of Nell B. Strachan, pro hac vice, which is attached hereto as **Exhibit B**.

WHEREFORE it is respectfully requested that the motion to admit Nell B. Strachan, pro hac vice, to represent Defendants Abbott Laboratories and Abbott Laboratories, Inc. in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11 day of August, 2008.



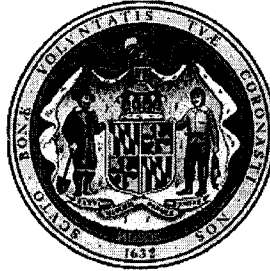
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*Attorneys for Defendants Abbott  
Laboratories and Abbott Laboratories, Inc.*

# **EXHIBIT A**

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the eighteenth day of December, 1974,*

**Nell Margaret Berelson Strachan**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
seventh day of August, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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NEW MEXICO UNITED FOOD AND  
COMMERCIAL WORKERS UNION'S AND  
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FUND, on behalf of itself and all others similarly  
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07-CV-6916 (JGK)

ECF Case

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Michael C. Hartmere, attorney for Defendants Abbott Laboratories and Abbott Laboratories, Inc. and said sponsor attorney's declaration in support;

**IT IS HEREBY ORDERED** that:

Nell B. Strachan  
Venable LLP  
210 Allegheny Avenue  
Towson, MD 21204  
Telephone: (410) 494-6200  
Fax: (410) 821-0147  
E-mail: nbstrachan@venable.com

is admitted to practice pro hac vice as counsel for Defendants Abbott Laboratories and Abbott Laboratories, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.



Dated: August \_\_\_\_, 2008  
New York, New York

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U.S.D.J./U.S.M.J.

**CERTIFICATE OF SERVICE**

I, Michael C. Hartmere, hereby certify that on August 11, 2008, I caused a true and correct copy of the foregoing **Motion to Admit Counsel Pro Hac Vice**, to be served via email on counsel of record at the following addresses:

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*Attorneys for Plaintiff New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, on behalf of itself and all others similarly situated*

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*Attorneys for Defendants Purdue Pharma L.P., The Purdue Frederick Company Inc., Purdue Pharma Inc., The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell and Paul D. Goldenheim*



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Michael C. Hartmere